

EXHIBIT A

Blozis
Linda J. Blozis, Volume 2

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
January 13, 2007

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1 say sometimes co-workers at the time, a number of
2 co-workers, and perhaps Mr. Becker or Mr. Landis.
3 Q. What about Mr. Gilmore?
4 A. I can't recollect if I had that type of
5 conversation with him.
6 Q. Why did you say that you would be interested in
7 going down to Naples?
8 A. Because it was a nice place to live and work, and
9 warm and sunny.
10 Q. And you had a house down there, correct?
11 A. I did, yes.
12 Q. While you were employed at Mellon did you ever
13 hear Brendan Gilmore make a comment about Maria Dunlop's
14 boots?
15 A. Specifically, I can't recollect. But there were
16 comments and asides that Gilmore had made about other
17 employees at the time, that I worked at the Greenville
18 office.
19 Q. But specifically as it relates to Maria, did you
20 ever hear Mr. Gilmore make any comments about her boots
21 or her attire?
22 A. Her attire, sometimes, yes.
23 Q. What did you hear?
24 A. Exact and specifically, I don't recollect at this

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1 time. But some comments that I thought might be
2 inappropriate.
3 Q. Like what?
4 A. Perhaps -- my recollection is that perhaps, how
5 an outfit looks or possibly fits somebody.
6 Q. When you say somebody, meaning Maria?
7 A. Maria, and I am also recalling when, a specific
8 incident, instance when we shared space with the retail
9 folks, before they became Citizens, there was a sales gal
10 who was married, and who was an attractive single mother,
11 a responsible worker, and others in that office --
12 because at the time Maria wasn't even on board yet -- he,
13 Gilmore would come into the office and stop by her desk
14 and say things and comments to her that appeared to be
15 unprofessional.
16 Q. Like what?
17 A. The exact words I don't recall. But I can tell
18 you that Miss Cindy Wilson was an employee of Mellon at
19 the time, myself, I'm trying to think of -- Joan Rowe,
20 who worked for Holding Companies, he just seemed to talk
21 in an inappropriate manner to her, his tone of voice, an
22 obvious, I think we used the term gushing or flirting.
23 And this young lady tried to conduct herself in a
24 professional manner and get on with her work, and then he

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1 would move on to speak to the supervising officer, which
2 I think was Landis or Becker at that time.
3 Q. What time frame?
4 A. Time frame meaning what? I don't understand.
5 Q. What year? If you have a specific date that
6 would be great.
7 A. It would have been prior to the lift-out that
8 occurred when Mellon sold the retail and business banking
9 operations to Citizens Bank.
10 Q. 1998?
11 A. No. We had gone -- our group had moved into the
12 Greenville office -- oh, my gosh, see if I can recollect
13 that year -- probably around 2002 to 2003, and Citizens,
14 or that which became Citizens retail was still operating
15 in that office until it can move out.
16 Q. Now, the person that you described her as a
17 single mom, who was it?
18 A. At this point I don't recollect her name, but I
19 could, with research I probably could find that out. She
20 sat at the next desk from me. She may still be with
21 Citizens. She was an attractive girl, but a professional
22 worker.
23 Q. Now, with respect to, you described what Mr.
24 Gilmore would do I guess when he came down to the

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1 Delaware office, and she would be sitting at her desk?
2 A. Yes.
3 Q. Okay. Now, did you overhear the conversations?
4 A. Several of us overheard the conversations.
5 Q. Did Mr. Gilmore ever make any comments to you
6 that you felt were inappropriate?
7 A. At this point I don't recollect in the same way
8 that he did to this younger employee.
9 Q. Okay. When you say "in the same way," whether
10 they were in the same way or some other way, you had
11 spoken earlier about the conversation that you had in his
12 office where you felt he yelled at you, so you told me
13 about that time. Any other times?
14 A. I don't fully understand your comparison or the
15 premise.
16 Q. Let me just --
17 A. Would you clarify?
18 Q. Because what I'm getting from you is that Mr.
19 Gilmore made comments that you took to be of a sexual
20 nature concerning this woman who may or may not have been
21 a Citizens employee; is that right?
22 A. That's correct. And it was not just myself who
23 understood this to be that way.
24 Q. All right. Did Mr. Gilmore ever make any

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EXHIBIT B

Blozis
Maria F. Dunlop

v.
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December 21, 2006

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1 performance as a whole?
2 **A. I don't know.**
3 Q. Aside from yourself, do you know who else
4 received bonuses in the Delaware office in 2002?
5 **A. No.**
6 Q. Aside from yourself, do you know who else
7 received bonuses in the Delaware office in 2003?
8 **A. No.**
9 Q. Was there ever a time when you were able to
10 receive assistance from Linda Blozis in completing your
11 work load?
12 **A. Yes.**
13 Q. Do you remember when that was?
14 **A. The whole time we worked together, we helped each**
15 **other.**
16 Q. And with regard to your assignments, she was
17 allowed to help you complete your assignments if there
18 was more work than you had time to complete?
19 **A. Yes.**
20 Q. At Mellon with regard to vacation, did you have
21 to request vacation?
22 **A. Yes.**
23 Q. And were you allotted so many days of vacation
24 each year?

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1 **A. Yes.**
2 Q. And did you have to make any specific requests in
3 advance of when and how many days you wanted to take
4 vacation?
5 **A. Yes.**
6 Q. Did anyone at Mellon ever deny one of your
7 requests for vacation?
8 **A. No.**
9 Q. Was there ever a point in 2003 when
10 Brendan Gilmore had a closed-door meeting with
11 Linda Blozis?
12 MS. WILSON: Objection to form.
13 **A. I don't remember that.**
14 Q. Do you ever recall Brendan Gilmore shouting at
15 Linda Blozis behind closed doors?
16 **A. I don't remember.**
17 Q. Do you ever remember Brendan Gilmore using
18 profanity with Linda Blozis?
19 **A. I don't remember.**
20 Q. Did Linda Blozis ever tell you that
21 Brendan Gilmore had used profanity with her?
22 **A. I don't remember.**
23 Q. Do you recall Linda Blozis ever coming to you in
24 tears or upset because of a meeting she had with

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1 Brendan Gilmore?
2 **A. Yes.**
3 Q. Do you remember what she said to you?
4 **A. No.**
5 Q. Do you remember what you said to her?
6 **A. No.**
7 Q. Do you remember if she had told you that
8 Brendan Gilmore had swore at her?
9 **A. I don't remember specifics.**
10 Q. You don't remember specific words that she had
11 said he said to her?
12 **A. Correct. I remember -- I can't think of specific**
13 **things, but I remember that he did not treat her well.**
14 Q. And did he not treat her well on one occasion or
15 was this something that happened during the course of her
16 employment on more than one occasion?
17 **A. More than one occasion, yes.**
18 Q. How did he not treat her well?
19 **A. I can't think of specific things. I can't**
20 **remember specific things. I just remember in my mind**
21 **that he wasn't nice to her.**
22 Q. Did you ever have any problems with
23 Brendan Gilmore not being nice to you?
24 **A. Again, I don't remember specifics, but he -- he's**

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1 **not a friendly person. He makes comments that aren't**
2 **always appropriate. His attitude, his demeanor, his...**
3 Q. So during the time you worked there,
4 Brendan Gilmore made inappropriate comments?
5 MS. WILSON: Objection to form.
6 **A. I can remember one specific comment he made about**
7 **knee-high boots I wore to work once.**
8 Q. What did he say?
9 **A. He just made a comment about them. And just the**
10 **way he looked at me I don't feel was appropriate.**
11 Q. Do you remember what he said?
12 **A. I don't remember specifically, no.**
13 Q. Did you feel he made a sexist comment to you?
14 MS. WILSON: Objection to form.
15 **A. Yes.**
16 Q. Do you feel that he did not treat women in the
17 office as well as he treated the men in the office?
18 MS. WILSON: Objection to form.
19 **A. Yes.**
20 Q. And to the best of your knowledge, he never made
21 any inappropriate comments to any of the men in the
22 office about their clothing or attire?
23 MS. WILSON: Objection to form.
24 **A. I don't remember any comments made to them.**

9 (Pages 30 to 33)